

REMARKS

Claims 1-6, 9-14, 18, 19, and 23-30 are pending in the application. Claims 18 and 23 are allowed. Specification paragraph 0062 has been amended to overcome the drawing objection at Section 3 of the office action (purge gas port 226 is shown in Fig. 2). Claims 1 and 28 have been amended to overcome the § 112 rejections at Sections 5-7 of the Office Action. Claims 1-6 and 9-11 are therefore in condition for allowance, as indicated at Section 14 of the Office Action. Claim 12 has been amended to correct a grammatical error. Reconsideration and withdrawal of the remaining rejections are requested in view of the following remarks.

Turning to the § 102 rejection at Section 9 of the Office Action, Chapman '207 does not teach or suggest several of the features recited in claim 12. Claim 12, for example, includes the limitation from formerly allowable (now-cancelled) claim 16 that one or more clutch drive pins are sealed against the first housing, and moveable from a first position, wherein the first motor drives the first shaft through the first clutch, to a second position, wherein the first shaft can rotate free of the motor.

Element 833 in Chapman '207, conversely, is not a clutch drive pin, but is a sleeve that prevents over-tightening of a bolt 832 (col. 17, lines 33-34). The sleeve 833 is not sealed against a first housing, and it is not moveable from a first position, wherein a first motor drives a first shaft through a first clutch, to a second position, wherein a first shaft can rotate free of the motor, as claimed. Indeed, the sleeve 833 is simply used for preventing over-tightening of, and setting a desired preset tension for, the bolt 832 (col. 18, lines 26-29). The sleeve 833 has no correlation whatsoever to a clutch drive pin. Thus, Chapman '207 does not disclose the claimed clutch drive pins, and claim 12 is allowable over Chapman '207.

Various other elements recited in claim 12 are also missing from Chapman '207. While Chapman '207 discloses a motor 804 in Fig. 22, for example, that motor is not "for rotating the first arm relative to the first frame," as claimed. There is also no mention of any sealing or a sealed housing in Chapman '207. Furthermore, there is nothing in Chapman '207 from which can be drawn an inference that the motor 804 could be placed in a sealed housing, since there is no motivation therein to do so. Specifically, there is no mention in Chapman '207 of operation in wet or submerged conditions, since Chapman '207 is directed to addressing other issues.

Additionally, the head frame 124 shown in Fig. 4B of Chapman '207 is simply a tubular or channel-shaped structure which, as shown in Fig. 2, is positioned between the arm 26 of the camera dolly 20 and the post-assembly 42 of the crane 40. In any event, even if the boom arm 44 is considered a first arm and the head frame 124 is considered a second frame, as claimed, the head frame 124 is not attached to the boom arm 44, as claimed. Thus, claim 12 is allowable over Chapman '207 for these reasons, as well.

Turning to the § 102 rejection at Section 10 of the Office Action, Jones does not teach or suggest a camera support including a first purge gas port on a first housing connecting into a first interior sealed space, for delivering a purge gas into the first interior sealed space, and a second purge gas port on a second housing connecting into a second interior sealed space, for delivering a purge gas into the second interior sealed space, as recited in claims 24 and 26. Indeed, Jones does not teach purging the positioning structure disclosed therein with a gas, and there is no mention or suggestion in Jones of purging interior sealed spaces of the positioning structure.

As explained at paragraph 0063 of the application, by purging the interior spaces of the camera support with gas, the need for painting, plating, or otherwise finishing the internal surfaces of the camera support is avoided, and internal corrosion is reduced or eliminated. Since the purged spaces are positively pressurized, they can also remain dry even if a slow leak develops. Jones does not suggest or recognize the advantages of such a purging process.

Jones, conversely, teaches a process for valve-directed filling and draining of paired chambers, which generates hydraulic (or pneumatic) force for applying torque to the shaft of a positioner (col. 6, lines 26-29). Fluid is drained from the system during rotation of the shaft (col. 6, lines 30-32). Draining fluid does not, however, constitute purging the system with a gas.

The process of draining does not involve replacing a potentially corrosive atmosphere (air containing water vapor) with an inert gas, such as nitrogen, as does a purging process. There is no suggestion in Jones to follow the draining process with a purging process, or to deliver a purge gas into a sealed interior space at any time. Thus, there is no suggestion in Jones to include purge gas ports, as claimed, in its positioning system. Claims 24 and 26, therefore, are allowable over Jones.

The remaining rejections are directed to claims that depend from claims shown above to be allowable. Several of the dependent claims include features similar to or cumulative with those shown above to be allowable. Thus, many of the dependent claims not specifically addressed herein are believed to be separately allowable over the cited references.

In view of the foregoing, it is submitted that the claims are in condition for allowance. A Notice of Allowance is requested.

Dated: June 14, 2006

Respectfully submitted,

Customer No. 34055
Perkins Coie LLP
Patent - LA
P.O. Box 1208
Seattle, WA 98111-1208
Phone: (310) 788-9900
Fax: (206) 332-7198

PERKINS COIE LLP

By: Kenneth H. Ohriner
Kenneth H. Ohriner
Reg. No. 31,646